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September 15, 2020

BY ECF

Honorable Ramon E. Reyes, Jr.
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Ismael Joel Suren, et al. v. City of New York, et al
19 Civ. 2659 (KAM)(RER)

Dear Judge Reyes:

This firm represents the plaintiffs with respect to the above-referenced matter. I write to respectfully request that the Court schedule a pre-motion conference wherein plaintiffs' attorney intends to request leave to withdraw as counsel for the plaintiffs.

Pursuant to Local Rule 1.4, "[a]n attorney who has appeared as attorney of record for a party may be relieved or displaced only by order of the court and may not withdraw from a case without leave of the court granted by order. Such an order may be granted only upon a showing by affidavit or otherwise of satisfactory reasons for withdrawal or displacement and the posture of the case, including its position, if any, on the calendar." A client's termination of the attorney-client relationship is a satisfactory reason for withdrawal.

A client has the unqualified right to terminate the attorney-client relationship at any time, with or without cause, regardless of whether a contract exists formalizing the relationship. *In re Thelen LLP*, 24 N.Y.3d 16, 28, 20 N.E.3d 264, 270 (2014); *Matter of Cooperman*, 83 N.Y.2d 465, 472, 633 N.E.2d 1069, 1072 (1994). And pursuant to New York's Rules of professional Conduct ("Rules"), an attorney must withdraw from representing a client when the attorney is discharged by the client. See N.Y. Comp. Codes R. & Regs. Tit. 22, § 1200, Rule 1.16(b).

I have been discharged by the plaintiffs who advised that they will have their new attorneys contact me. Having waited for two weeks without being contacted by their new attorney, it became necessary to seek the leave of court to withdraw as attorney.

Based on the forgoing, I respectfully request that the Court schedule a pre-motion conference. The undersigned has conferred with defendants' counsel about this letter and my proposed motion.

Thank you for your consideration herein.

Respectfully submitted

/s/

Philip Akakwam

cc: Inna Shapovalova, Esq.
Assistant Corporation Counsel (via ECF)